

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
(Case No. 05-713)**

In re Application of:)	
)	
Devan Govender)	
Francesco Verardi)	
)	Examiner: Masud Ahmed
Serial No.: 10/550,744)	
)	Art Unit: 3714
Filed: August 24, 2006)	
)	Confirmation No. 6074
For: Promotion Administration System And Method)	

Mail Stop Issue Fee
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Dear Sir:

Applicant acknowledges the Examiner's statement of Reasons for Allowance of the above-referenced patent application and agrees that the claimed subject matter is patentable. However, Applicant takes no position regarding the Reasons for Allowance presented by the Examiner other than the positions Applicant may have previously taken during prosecution. Therefore, the Examiner's Reasons for Allowance should not be attributed to Applicant as an indication of the basis for Applicant's belief that the claims are patentable. Furthermore, Applicant respectfully asserts that there may be additional reasons for patentability of the claimed subject matter not explicitly stated in this record

and Applicant does not waive its rights to such arguments by not further addressing such reasons herein.

Respectfully submitted,

Date: December 1, 2010

By: /Richard A. Machonkin/
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Reg. No. 41,962